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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
The Use of N11 Codes and Other) CC Docket No. 92-105
Abbreviated Dialing Arrangements)

REPLY COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT) hereby submits its Reply Comments in the Further Notice of Proposed Rulemaking (FNPRM) in this docket.

I. **SWBT's COMMENTS**

On March 31, 1997, SWBT filed its Comments in this proceeding regarding nationwide access to Telecommunications Relay Service (TRS) over 711. The major point SWBT raised in its Comments is requesting the Commission to treat the FNPRM as a Notice of Inquiry (NOI) because there are too many undetermined issues to fashion an order at this time. SWBT is also concerned about the costs of any required implementation and how such costs would be recovered.

II. **OTHER COMMENTS**

There was little common ground among the parties filing comments. A number of parties, including the majority of the Regional Bell Operating Companies (RBOCs), raised the same concerns as SWBT. Specifically, many parties noted that numerous technical issues must be

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resolved before 711 can be used for nationwide access to TRS.¹ Others emphasized that there is simply a need for more information to determine whether the concept of 711 for TRS is in fact viable.² Sprint said it best when it recommended "the industry establish a task force to determine whether the problems associated with N11 access can be resolved within a reasonable amount of time and without undue cost."³ In light of the diverse views of the parties regarding implementation of 711 for TRS, SWBT would not be opposed to the idea of formation of an industry task force to address the issues prior to issuance of an order.⁴

Other parties also expressed concern regarding cost recovery for any required implementation.⁵ SWBT reemphasizes its position that if the Commission requires implementation of 711, it must provide for adequate cost recovery.

¹See i.e., Bell Atlantic/NYNEX Comments at 2; AT&T Comments at 1; BellSouth Comments at 5.

²See i.e., US West at 5; Sprint at 2.

³Sprint Comments at 4.

⁴However, it is our understanding that the industry has previously addressed these issues, and that there are serious technical concerns with the implementation of this type of service in coin telephones.

⁵See i.e., US West Comments at 8; Ameritech Comments at 3; Bell South Comments at 6; Sprint Comments at 2.

III. **CONCLUSION**

For all the foregoing reasons, SWBT respectfully requests the Commission adopt its Reply Comments and treat this proceeding as a NOI.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By Marjorie Morris Weisman
Robert M. Lynch
Durward D. Dupre
Mary W. Marks
Marjorie M. Weisman
One Bell Center, Room 3520
St. Louis, Missouri 63101
(314) 235-2507

ATTORNEYS FOR SOUTHWESTERN BELL
TELEPHONE COMPANY

April 30, 1997

CERTIFICATE OF SERVICE

I, Liz Jensen, hereby certify that the foregoing,
Reply Comments of Southwestern Bell Telephone Company, in
Docket No. 92-105, have been served this 30th day of April,
1997 to the Parties of Record.

Liz Jensen
Liz Jensen

April 30, 1997

Brian R. Gilomen
AMERITECH OPERATING COMPANIES
2000 Ameritech Center Drive
Room 4H82
Hoffman Estates, IL 60196-1025

John M. Goodman
BELL ATLANTIC TELEPHONE CO.
1710 H Street, N.W.
Washington, D.C. 20006

Thompson T. Rawls
BELLSOUTH CORPORATION
4300 Southern Bell Center
675 West Peachtree Street, N.E.
Atlanta, GA 30367-6000

Campbell Ayling
NYNEX TELEPHONE COMPANIES
120 Bloomingdale Road
4th Floor
White Plains, NY 10605

James P. Tuthill
PACIFIC BELL AND NEVADA BELL
TELEPHONE COMPANIES
140 New Montgomery St.
Room 1522-A
San Francisco, CA 94105

Lawrence E. Sarjeant
U S WEST COMMUNICATIONS, INC.
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

ITS, Inc.
1919 M Street, N.W.
Room 246
Washington, D.C. 20554

Carol Schultz
MCI Telecommunications
Corporation
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Jay C. Keithley
Sprint Corporation
1850 M Street, N.W.
Suite 1110
Washington, D.C. 20036

Francine J. Berry
AT&T Communications
Room 17-3138C
295 N. Maple Avenue,
Basking Ridge, N.J. 07920

Michael S. Slomin
Bell Communications Research, Inc.
290 West Mount Pleasant Avenue
Livingston, New Jersey 07039

Linda Kent
Associate General Counsel
United States Telephone Association
1401 H Street, N.W. - Ste. 600
Washington, D.C. 20005-2136

Stephen R. Bell
Squire, Sanders & Dempsey
Attorneys for
BT North America, Inc.
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20044

Linda D. Hershman
Vice President-External Affrs.
The Southern New England Telephone
Company
227 Church Street, 14th Floor
New Haven, Connecticut 06510

Albert H. Kramer
Keck, Mahin & Cate
Attorneys for
The American Public Communications
Council
1201 New York Avenue, N.W.
Washington, D.C. 20005-3919

Paul J. Berman
Covington & Burling
Attorney for Puerto Rico Telephone
Authority
1201 Pennsylvania Ave., N.W.
Washington, D.C. 20044

David Cosson
L. Marie Guillory
National Telephone Cooperative
Association
2626 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

Ronald L. Lehr
Attorney for
Alternative Weekly Newspapers
934 S. Gilpin Street
Denver, Colorado 80209-4521

Josephine S. Trubek
Rochester Telephone Corp.
180 South Clinton
Rochester, New York 14646

James S. Blaszk
Gardner, Carton & Douglas
Ad Hoc Telecommunications
Users Committee
1301 K Street, N.W.
Suite 900 East Tower
Washington, D.C. 20005

Roy L. Kaufmann
General Partner and
Agent for Datatrex
1119 12th Street, N.W.
Washington, D.C. 20005-4632

Joseph P. Markoski
Squire, Sanders & Dempsey
Attorney for ITAA
1201 Pennsylvania Ave., N.W.
Washington, D.C. 20044

David J. Gudino
GTE Service Corporation
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

R. Michael Senkowski
Jeffrey S. Linder
Wiley, Rein & Fielding
Attorneys for
Mobile Telecommunication
Technologies Corporation
1776 K Street, N.W.
Washington, D.C. 20006

Andrew D. Lipman
Swidler & Berlin
Attorneys for MFS
3000 K Street, N.W.
Washington, D.C. 20007

Carol F. Sulkes
Central Telephone Company
8745 Higgins Road
Chicago, Illinois 60631

Paul J. Berman
Covington & Burling
Attorney for
Anchorage Telephone Utility
1201 Pennsylvania Ave., N.W.
Washington, D.C. 20044

Richard E. Wiley
Wiley, Rein & Fielding
Attorney for Newspaper
Association of America
1776 K Street, N.W.
Washington, D.C. 20036

Werner K. Hartenberger
Dow, Lohnes & Albertson
Attorneys for Cox Enterprises
1255 23rd Street, N.W.
Suite 500
Washington, D.C. 20037

Francine J. Berry
American Telephone & Telegraph
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920-1002

Jan Masek
Professional Business Systems
302 North LaBrea Avenue, Suite 200
Los Angeles, CA 90036

George S. Kois
LO/AD Communications
200 South Los Robles Ave.
Suite 250
Pasadena, CA 91101

Richard E. Wiley
Wiley, Rein & Fielding
Attorneys for
Newspaper Association of
America
1776 K Street, N.W.
Washington, D.C. 20036

National Center for Law and
Deafness
800 Florida Ave., N.E.
Washington, D.C. 20002

Telecommunications for the
Deaf, Inc.
8719 Colesville Road
Suite 300
Silver Spring, MD 20910

Janice Myles
FCC
Common Carrier Bureau
1919 M Street N.W.
Washington, D.C. 20037